

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

LARRY HOUSEHOLDER, et al.,

Defendants.

:
:
:
:
:
:
:
:
:
:

CASE NO. 1:20-CR-77

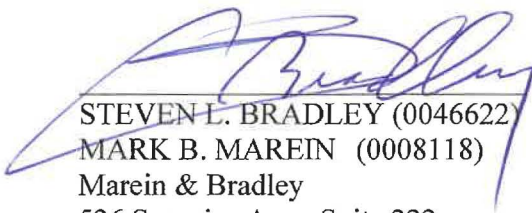
JUDGE TIMOTHY S. BLACK

STIPULATIONS


The parties respectfully submit the following stipulations to be admitted at trial.

Respectfully submitted,

KENNETH L. PARKER
United States Attorney



STEVEN L. BRADLEY (0046622)
MARK B. MAREIN (0008118)
Marein & Bradley
526 Superior Ave., Suite 222
Cleveland, OH 44114
(216) 781-0722




ROBERT T. GLICKMAN (0059579)
NICHOLAS R. OLESKI (0095808)
McCarthy, Lebit, Crystal & Liffman Co., LPA
1111 Superior Avenue East, Suite 2700
Cleveland, OH 44114
(216) 696-1422

Counsel for Larry Householder



MATTHEW C. SINGER (IL 6297632)
EMILY N. GLATFELTER (0075576)
MEGAN GAFFNEY PAINTER
(NY 4849220)
Assistant United States Attorneys
221 East Fourth Street, Suite 400
Cincinnati, Ohio 45202
(513) 684-3711



KARL H. SCHNEIDER (0012881)
TODD A. LONG (0082296)
McNees Wallace & Nurick LLC
21 East State St., Suite 1700
Columbus, OH 43215
(614) 719-2843

Counsel for Matthew Borges

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

LARRY HOUSEHOLDER, et al.,

Defendants.

CASE NO. 1:20-CR-77


JUDGE TIMOTHY S. BLACK

STIPULATION

Pursuant to Rule 32.2(b)(5)(A) of the Federal Rules of Criminal Procedure, the undersigned parties do not request that the jury be retained to determine the forfeitability of specific property if it returns a guilty verdict.

It is further stipulated and agreed that this Stipulation may be introduced into evidence as an exhibit, and that the facts herein stipulated have the same status, dignity, and effect as the undisputed testimony of credible witnesses.


Dated: 1/20/2023


MATTHEW SINGER
EMILY N. GLATFELTER
MEGAN GAFFNEY PAINTER
Assistant United States Attorneys

Dated: 01/20/2023.


LARRY HOUSEHOLDER

Dated: 1/20/2023


STEVEN L. BRADLEY
MARK B. MAREIN
ROBERT GLICKMAN
NICHOLAS R. OLESKI
Counsel for Defendant Larry Householder

Dated: 1/20/23



MATTHEW BORGES

Dated: 1/20/23



KARL H. SCHNEIDER

TODD A. LONG

Counsel for Defendant Matthew Borges

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

LARRY HOUSEHOLDER, et al.,

Defendants.

:
:
:
:
:
:
:
:
:
:
:

CASE NO. 1:20-CR-77

JUDGE TIMOTHY S. BLACK

STIPULATION

The parties stipulate that the Southern District of Ohio has venue over this case.

It is further stipulated and agreed that this Stipulation may be introduced into evidence as an exhibit, and that the facts herein stipulated have the same status, dignity, and effect as the undisputed testimony of credible witnesses.

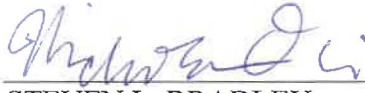
Dated: 1/20/2023


MATTHEW SINGER
EMILY N. GLATFELTER
MEGAN GAFFNEY PAINTER
Assistant United States Attorneys

Dated: 01/20/2023


LARRY HOUSEHOLDER

Dated: 1/20/2023


STEVEN L. BRADLEY
MARK B. MAREIN
ROBERT GLICKMAN
NICHOLAS R. OLESKI
Counsel for Defendant Larry Householder

Dated: 1/20/23


MATTHEW BORGES

Dated: 1/20/23


KARL H. SCHNEIDER
TODD A. LONG

Counsel for Defendant Matthew Borges

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

V.

LARRY HOUSEHOLDER, et al.,

Defendants.

• •
• •
• •
• •
• •
• •
• •
• •
• •
• •
• •
• •

CASE NO. 1:20-CR-77

JUDGE TIMOTHY S. BLACK

STIPULATION

The parties stipulate that the records provided by the following entities to the government and those records provided by the following entities to Defendant Larry Householder that he produced to the government from Taft, Stettinius & Hollister, LLP are records of regularly conducted activity, and therefore are business records for purposes of Federal Rule of Evidence 803(6). The parties reserve the right to object to the admission of specific records on other bases, including, for example, objections based on hearsay within hearsay, relevance, and Federal Rule of Evidence 403.

- (1) Records from 17 Consulting, LLC.
- (2) Records from Allen, Stovall, Neuman, Fisher & Ashton LLP
- (3) Records from Anna Lippincott & Associates, LLC.
- (4) Records from Apple, Inc.
- (5) Records from Amalgamated Bank.
- (6) Records from Arena Online, LLC.
- (7) Records from AT&T.
- (8) Records from Brooke Bodney.
- (9) Records from Centric Bank.

- (10) Records from CGI Investigation, LLC.
- (11) Records from Charles Schwab.
- (12) Records from Crossroads Media.
- (13) Records from Discover Products, Inc.
- (14) Records from Energy Harbor, LLC
- (15) Records from Fifth Third Bank.
- (16) Records from FirstEnergy.
- (17) Records from First National Bank of Pennsylvania.
- (18) Records from Forcht Bank, NA.
- (19) Records from Google.
- (20) Records from FPI Strategies, LLC.
- (21) Records from Hardworking Ohioans.
- (22) Records from Huntington National Bank.
- (23) Records from JPMorgan Chase Bank N.A.
- (24) Records from Lincoln Strategy Group.
- (25) Records from LoParo Public Relations.
- (26) Records from Eric Lykan.
- (27) Records from MC Fitzmartin, LLC.
- (28) Records from Mighty Group.
- (29) Records from Nordic Construction.
- (30) Records from Ohio AFL-CIO.
- (31) Records from Partners for Progress, Inc.
- (32) Records from Paychex, Inc.
- (33) Records from PNC Bank, N.A.

- (34) Records from Red Maverick Media.
- (35) Records from Silver Bullet Group, Inc.
- (36) Records from Steiner Public Relations.
- (37) Records from Storytellers Mail, LLC.
- (38) Records from Taft, Stettinius & Hollister, LLP.
- (39) Records from The Community Bank.
- (40) Records from The Union Bank.
- (41) Records from T-Mobile.
- (42) Records from United Bank.
- (43) Records from Verizon Wireless.
- (44) Records from Winterset CPA Group, Inc.
- (45) Records Wyncroft Strategies, LLC.

It is further stipulated and agreed that this Stipulation may be introduced into evidence, and that the facts herein stipulated have the same status, dignity, and effect as the undisputed testimony of credible witnesses.

Dated: 1/20/2023



MATTHEW SINGER
EMILY N. GLATFELTER
MEGAN GAFFNEY PAINTER
Assistant United States Attorneys

Dated: 01/20/2023.



LARRY HOUSEHOLDER

Dated: 1/20/2023




STEVEN L. BRADLEY
MARK B. MAREIN
ROBERT GLICKMAN
NICHOLAS R. OLESKI
Counsel for Defendant Larry Householder

Dated: 1/20/23


MATTHEW BORGES

Dated: 1/20/23


KARL H. SCHNEIDER
TODD A. LONG
Counsel for Defendant Matthew Borges

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA

v.

LARRY HOUSEHOLDER, et al.,

Defendants.

:
:
:
:
:
:
:
:
:
:

CASE NO. 1:20-CR-77

JUDGE TIMOTHY S. BLACK

STIPULATION

The parties stipulate the telephone communications introduced at trial for phone number 740-707-2500, which was used by Larry Householder, including phone calls and text messages, utilized a facility of interstate commerce by using telephone systems through Verizon and AT&T.

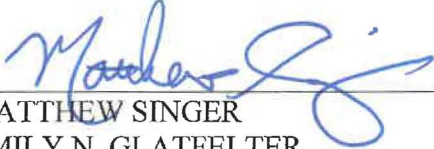
The parties stipulate the telephone communications introduced at trial for phone number 614-204-1050, which was used by Matthew Borges, including phone calls and text messages, utilized a facility of interstate commerce by using telephone systems through Verizon.

The parties stipulate that funds transferred from FirstEnergy Service Company bank accounts to Generation Now bank accounts utilized a facility in interstate commerce by using the banking system that transmitted wires across state lines.


The parties further stipulate that the enactment into law of House Bill 6 affected interstate commerce.

It is further stipulated and agreed that this Stipulation may be introduced into evidence as an exhibit, and that the facts herein stipulated have the same status, dignity, and effect as the undisputed testimony of credible witnesses.

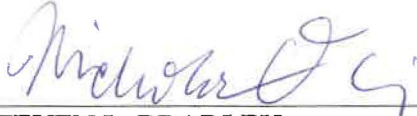
Dated: 1/20/2023


MATTHEW SINGER
EMILY N. GLATFELTER
MEGAN GAFFNEY PAINTER
Assistant United States Attorneys

Dated: 01/20/2023.


LARRY HOUSEHOLDER


Dated: 1/20/2023


STEVEN L. BRADLEY
MARK B. MAREIN
ROBERT GLICKMAN
NICHOLAS R. OLESKI
Counsel for Defendant Larry Householder

Dated: 1/20/23


MATTHEW BORGES

Dated: 1/20/23


KARL H. SCHNEIDER
TODD A. LONG
Counsel for Defendant Matthew Borges

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

LARRY HOUSEHOLDER, et al.,

Defendants.

:
:
:
:
:
:
:
:
:
:

CASE NO. 1:20-CR-77

JUDGE TIMOTHY S. BLACK

STIPULATION

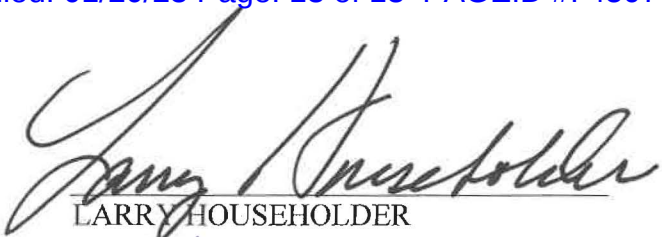
The parties stipulate that the documents, audio, video, and forensic extractions of devices and accounts produced by the government in discovery; the documents marked LHH000001-000285 and LHH004175-004369 produced by Larry Householder in discovery; and the documents marked BORGES3-12; BORGES14-17; BORGES19-28; BORGES31-37; BORGES44-48; BORGES52; BORGES54-63; BORGES65-67; BORGES69-254; BORGES256-257; BORGES259-434 produced by Matthew Borges in discovery, are authentic for purposes of Federal Rule of Evidence 901. The parties reserve the right to object to the admission of specific records on other bases.

It is further stipulated and agreed that this Stipulation may be introduced into evidence, and that the facts herein stipulated have the same status, dignity, and effect as the undisputed testimony of credible witnesses.


Dated: 1/20/2023


MATTHEW SINGER
EMILY N. GLATFELTER
MEGAN GAFFNEY PAINTER
Assistant United States Attorneys

Dated: 01/20/2023.


LARRY HOUSEHOLDER


Dated: 1/20/2023


STEVEN L. BRADLEY
MARK B. MAREIN
ROBERT GLICKMAN
NICHOLAS R. OLESKI
Counsel for Defendant Larry Householder

Dated: 1/20/23


MATTHEW BORGES

Dated: 1/20/23


KARL H. SCHNEIDER
TODD A. LONG
Counsel for Defendant Matthew Borges